## Case3:11-cv-06376-EDL Document124 Filed03/18/13 Page1 of 4 1 Rory C. Quintana (SBN 258747) The Law Offices of Rory C. Quintana 201 Spear Street, Suite 1100 3 San Francisco, CA 94105 Telephone: (415) 426-3517 Fax: (415) 426-3518 4 rcquintana@rcqlegal.com 5 Attorneys for Plaintiff Henry M. Burgoyne, III 6 **ANDERIES & GOMES LLP** 7 Shane K. Anderies (SBN 215415) Allan J. Gomes (SBN 225810) S. Christine Young (SBN 253964) 8 601 Montgomery Street, Suite 888 9 San Francisco, California 94111 Telephone: (415) 217-8802 Facsimile: (415) 217-8803 10 E-Mail: sanderies@andgolaw.com 11 Attorneys for Defendants Karl Kronenberger and 12 Kronenberger Rosenfeld LLP 13 UNITED STATES DISTRICT COURT 14 NORTHERN DISTRICT OF CALIFORNIA 15 16 CASE NO. 3:11-cv-06376 EDL HENRY M. BURGOYNE, III 17 Plaintiff, STIPULATED REQUEST FOR ORDER CHANGING TIME AND [PROPOSED] 18 ORDER TO CONTINUE HEARING ON v. PLAINTIFF'S MOTION TO COMPEL 19 FURTHER DISCOVERY RESPONSES FROM KARL M. KRONENBERGER, an individual; 20 KRONENBERGER ROSENFELD LLP, a DEFENDANTS KARL KRONENBERGER California limited liability partnership; and AND KRONENBERGER ROSENFELD LLP DOES 1 through 10, inclusive, 21 AS MODIFIED 22 Defendants. 23 24 25 26 27

1

28

Case No. 3:11-cv-06376-EDL

STIPULATED REQUEST FOR ORDER CHANGING TIME AND [PROPOSED] ORDER TO CONTINUE HEARING ON PLAINTIFF'S MOTION TO COMPEL

## 

1	Pursuant to Civil Local Rules 7-7(b), 6-1(b), and 6-2(a), the parties agree to continue the	
2	hearing on Plaintiff's Motion to Compel Further Discovery Responses to Defendants Karl	
3	Kronenberger and Kronenberger Rosenfeld LLP ("Plaintiff's Motion"). The hearing on	
4	Plaintiff's Motion is currently set for April 2, 2013 and the parties agree to continue the hearing	
5	to April 9, 2013.	
6	The parties request the hearing date be continued because Plaintiff's counsel and defense	
7	counsel are both unavailable to attend the hearing on Plaintiff's Motion on April 2, 2013, due to	
8	scheduling conflicts. The hearing date for Plaintiff's Motion was originally set for March 26,	
9	2013 but on March 13, 2013, the Court rescheduled the hearing for April 2, 2013. The requested	
10	time modification will have no effect on the schedule for the case.	
11	Based on the forgoing, the parties respectfully request the Court enter an order extending	
12	the hearing date on Plaintiff's Motion, as agreed to by the parties.	
13	3	
14	IT IS SO STIPULATED.	
15	5	
16	6 Dated: March 15, 2013 THE L	AW OFFICES OF RORY C. QUINTANA
17	7	
18	8 By:	s/Rory C. Quintana
19	9 Attorne	Rory C. Quintana ey for Plaintiff Henry M. Burgoyne, III
20	0	
21	1	
22	2 Dated: March 15, 2013 ANDE	RIES & GOMES LLP
23		
24	By:/	Shane K. Anderies Shane K. Anderies
25	Attorna Krones	ey for Defendants Karl Kronenberger and aberger Rosenfeld LLP
26		ioer ger Roseryeta 221
27	7	
28		
	∥ T	TIPULATED REQUEST FOR ORDER HANGING TIME AND [PROPOSED] ORDER O CONTINUE HEARING ON PLAINTIFF'S

MOTION TO COMPEL

## Case3:11-cv-06376-EDL Document124 Filed03/18/13 Page3 of 4

1		
2	<b>Filer's Attestation</b> : Pursuant to General Order No. 45 §X(B), I attest under penalty of	
3	perjury that concurrence in the filing of the document has been obtained from its signatory.	
4	Respectfully submitted,	
5	Respectionly submitted,	
6	Dated: March 15, 2013	
7	By:/s/ Shane K. Anderies Shane K. Anderies	
8	Attorney for Defendants Karl Kronenberger and Kronenberger Rosenfeld LLP	
9	Rosenfeld LLP	
10		
11		
12		
<ul><li>13</li><li>14</li></ul>		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28	3	
	Case No. 3:11-cv-06376-EDL STIPULATED REQUEST FOR ORDER CHANGING TIME AND [PROPOSED] ORDER	

STIPULATED REQUEST FOR ORDER CHANGING TIME AND [PROPOSED] ORDER TO CONTINUE HEARING ON PLAINTIFF'S MOTION TO COMPEL

## Case3:11-cv-06376-EDL Document124 Filed03/18/13 Page4 of 4

The Court having considered the stipulation of the parties, and good cause appearing therefore, orders the hearing on Plaintiff's Motion to Compel Further Discovery Responses to Defendants Karl Kronenberger and Kronenberger Rosenfeld LLP to be continued to April 9, 2013. at 9:30 a.m. PURSUANT TO STIPULATION, IT IS SO ORDERED Dated: March 18, 2013 IT IS SO ORDERED AS MODIFIED UNITED NORTHER Judge Elizabeth D. Laport Case No. 3:11-cv-06376-EDL STIPULATED REQUEST FOR ORDER